MONTGOMERY COUNTY
BOARD OF COMMISSIONERS

JAMILA H. WINDER, CHAIR
NEIL K. MAKHIJA, VICE CHAIR
THOMAS DIBELLO, COMMISSIONER

WWW.MONTGOMERYCOUNTYPA.GOV

MONTGOMERY COUNTY
PLANNING COMMISSION

MONTGOMERY COUNTY • PO BOX 311
NORRISTOWN, PA 19404-0311

610-278-3722
PLANNING@MONTGOMERYCOUNTYPA.GOV

SCOTT FRANCE, AICP
EXECUTIVE DIRECTOR

January 8, 2025

Mr. Charles L. Guttenplan, AICP
Director of Planning & Zoning Officer
Whitmarsh Township
616 Germantown Pike
Lafayette Hill, Pennsylvania 19444

Re: MCPC #23-0041-002
Plan Name: BMW Automotive Dealership Expansion
Consolidation of 4 tax parcels into one (1) lot
Comprising 5.45 acres (gross) / 4.886 acres (net)/ building of 72,995 sq. ft.
Situate: Commerce Drive (west) at Pennsylvania Avenue (south)
Whitemarsh Township

Dear Mr. Guttenplan:

We have reviewed the above-referenced subdivision and land development proposal in accordance with Section 502 of Act 247, "The Pennsylvania Municipalities Planning Code," as you requested on November 1, 2024. We forward this letter as a report of our review.

BACKGROUND

The applicant, MileOne Fort Washington LLC, has submitted a revised land development plan that was previously reviewed by this office in a letter to the township dated August 3, 2023. The plan proposes the redevelopment of an existing automobile dealership at 500 Pennsylvania Avenue. The development plan proposes to replace the dealership's existing 22,065 sq. ft. building with a five-story, 72,995 sq. ft. building. According to applicant, the BMW facility will be utilized for sales, service, storage and parking on the site. The plan states that after discussion with PennDOT, the five existing access points to Pennsylvania Avenue will be reduced to two access points: one full movement access driveway opposite Commerce Drive, and one right-in/right-out to the southeast of the signalized intersection at Pennsylvania Avenue and Commerce Drive. The development tract is located in the CR-L, Commercial-Retail Low District and in the Floodplain Conservation District. The entire site appears to be in the 100-year floodplain and is immediately adjacent to the Sandy Run. The proposed structure

appears to be elevated, and according to the applicant's documentation, various flood-proofing measures will be incorporated into the development.

In their decision on June 7, 2023, the Zoning Hearing Board (ZHB) of Whitemarsh Township granted 16 Variances and 2 Special Exceptions from the Floodplain Management Ordinance and the Riparian Corridor Conservation District. The board found that "The project does not involve development which may endanger human life or prohibited activities." One of the conditions of this decision is that ". . . All structures shall be designed and constructed so as to have the capability of resisting the one-percent – annual chance flood."

The submitted plan proposes the consolidation of four (4) existing lots and the elimination of the existing lot lines to create a new 5.133-acre lot. The lot at 500-514 Pennsylvania Avenue is immediately adjacent to the SEPTA Lansdale/Doylestown Regional Rail corridor. According to the applicant's submitted documentation, the entire site is located within the existing 100 and 500 year floodplain, as delineated on the effective FEMA Flood Insurance Rate Map plan covering the site area -- Panel number 42091C0289G, revised May 24, 2021. The building's expansion plan proposes a finished floor elevation of 171.0 ft on columns, in order to provide flood storage for the site.

COMPREHENSIVE PLAN COMPLIANCE

Consistency with the *MONTCO 2040* – County Comprehensive Plan

The county plan supports redevelopment and reinvestment in areas where infrastructure exists, with a special emphasis on opportunities near transit centers such as the Ft. Washington commuter rail center. However, the redevelopment of the site is entirely within the 100 and 500 year floodplain. This is inconsistent with the '*Sustainable Places*' land use vision of the *Montco 2040: A Shared Vison*, the Montgomery County Comprehensive Plan. The vision and plan recommendation is for communities to adopt local floodplain regulations that prohibit fill and buildings within the floodplain, except for sites that are brownfield redevelopments. Specifically it recommends that *"Auto-related uses and other uses that could have a strong negative environmental impact should be prohibited in all floodplain areas*." (pg. 41)

Consistency with the Whitemarsh Township Plan Update, 2020

The proposed development plan for this site is consistent with the township's Future Land Use Plan, 2028. The Whitemarsh Township Selective Comprehensive Plan Update, November 2020 identifies this area in the Future Land Use Plan, 2028 as a 'Mixed-Use Node'. The plan recommends leveraging the multi-modal, mixed-use assets with restaurants, retail and other related services, and including public space amenities in future developments.

RECOMMENDATION

We support the redevelopment of this site as proposed, and in our review we have identified several issues first raised in our previous review letter of August 2023 that remain relevant and we believe should be addressed in the township's consideration of this plan. One of the key issues is to ensure that the site's redevelopment is integrated with the Cross-County Trail planning and the need for safe pedestrian movements across the applicant's frontage and across Pennsylvania Avenue to provide safe connections to the CCT's Commerce Drive trail segment. This improvement and others are discussed below.

REVIEW COMMENTS

SITE PLANNING

1. **Floodplain Management Ordinance**

   The applicant received numerous variances from the Floodplain Management Ordinance and the decision by the Whitemarsh Zoning Hearing Board. We have concerns about the potential negative impacts on the public's health, safety and welfare, as well as the potential environmental impacts of the redevelopment and expansion of automobile use on this site. Given the history of extensive and damaging flooding in this area, the township should ensure that a flood emergency plan is developed that addresses how and where the dealership's vehicles will be stored during flooding events. The applicant should advise the township on how any automobile hazardous materials – such as motor oil, transmission and brake fluids, antifreeze and fuels – will be flood-proofed during these events. The applicant has received relief for the proposed location of the refuse containers. We recommend the township ensure that a protocol be established with the plan's approval that includes the 'flood-emergency plan', specifying the details of the enclosure and how the containers will be secured and flood-proofed.

2. **Cross-County Trail Connection- Intersection of Pennsylvania Ave. & Commerce Drive**.

   a. Cross-County Trail Corridor

   The planning, design and construction for Phase 3 of the Cross County Trail (CCT) & Road Diet is underway in the immediate vicinity of the applicant's development tract. A segment of the CCT trail is planned along the rear of the applicant's property. The township should be aware that discussions and agreements have occurred between the applicant and the County of Montgomery regarding the easement agreement needed to make the connection to the Commerce Drive segment of the CCT.

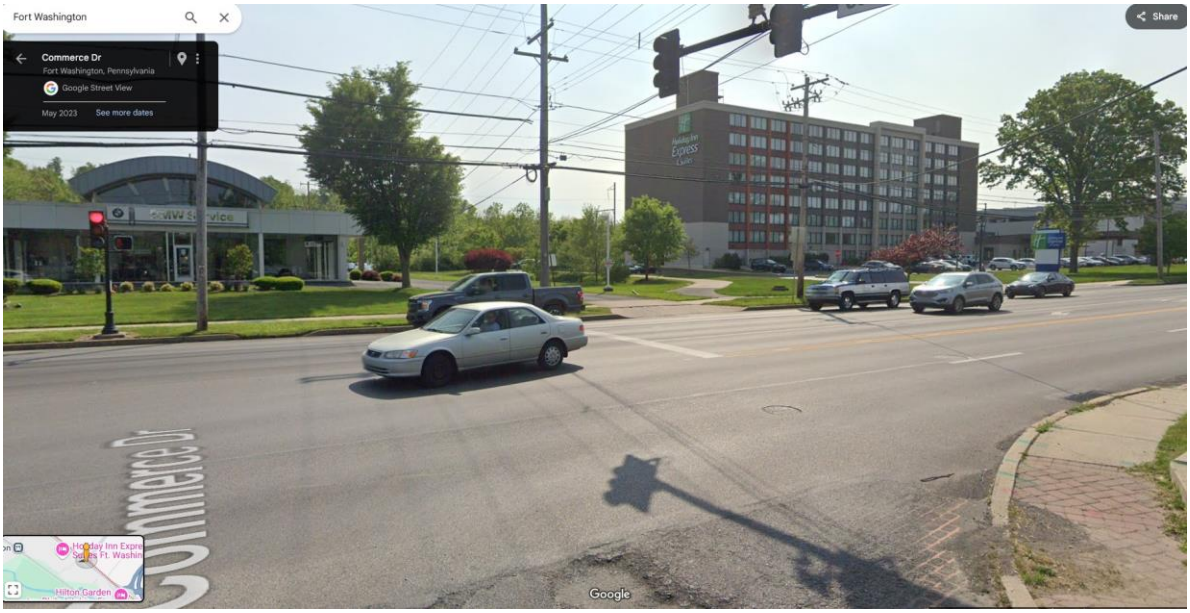
b. *Site Improvements - Intersection of Pennsylvania Avenue & Commerce Drive*.

- *Sidewalk along the frontage*.

In our letter of August 2023, we raised the issue that an inadequate sidewalk width was proposed along the frontage of the applicant's property and stressed the need for the applicant to assist in the improvements of the deteriorated crosswalk at the intersection of Pennsylvania Avenue and Commerce Drive. These improvements are not shown in the submitted development plan. The Cross-County Trail is a regionally significant trail that will connect the Schuylkill Trail in Conshohocken with the Pennypack Preserve and Trail in Willow Grove area. The trail utilizes the sidewalk along the applicant's frontage for the trail, and the standard width for this trail is 10 feet. We recommend the applicant revise the plan to include this dimension for the sidewalk.

- *Crosswalk at Pennsylvania Avenue and Commerce Drive*.

The applicant's site plan does not show an improved crosswalk at this intersection or the needed ADA curb ramp to provide safe and universal accessibility to the opposite side that is Commerce Drive in Upper Dublin Township. We believe this is the time to make both the crosswalk improvements and provide the needed ADA ramp. We recommend the applicant's planned improvements include the re-establishment of the pedestrian crosswalk and the construction of ADA curb ramps between the south side of Pennsylvania Avenue to the opposite side and the roadway. As shown in the attached photos, a thermal-stamped crosswalk existed across both Pennsylvania Avenue and Commerce Drive as recently as 2019. It has deteriorated and should be reinstituted to provide safe access for pedestrians and cyclists at this intersection (see below the May 2023 photo of this area).



Degraded crosswalk at Commerce Drive & Pennsylvania Avenue.

3. **MCPC # 23-0041-002 - Stamp of Approval**

   Please note that the submitted plan set has the incorrect MCPC number of #14-0121-003 on the various plan sheets. It should be corrected before final recording, and the correct number is MCPC # #23-0041-002, which should be placed on the plan.

CONCLUSION

We recommend the township address the above-mentioned issues and comments to its satisfaction. Please note that the review comments and recommendation contained in this report are advisory to the municipality and final disposition for the approval of any proposal will be made by the municipality.

Please be aware that the MCPC number #23-0041-002 has been set aside for the applicant' plan. If any subsequent plans are submitted for final recording, this MCPC number should appear on the applicant sheets within the plans in the box reserved for the seal of this agency.

Should the governing body approve a final plat of this proposal, the applicant must present the plan to our office for seal and signature prior to recording with the Recorder of Deeds office. A paper copy bearing the municipal seal and signature of approval must be supplied for our files.

Sincerely,

Barry W. Jeffries

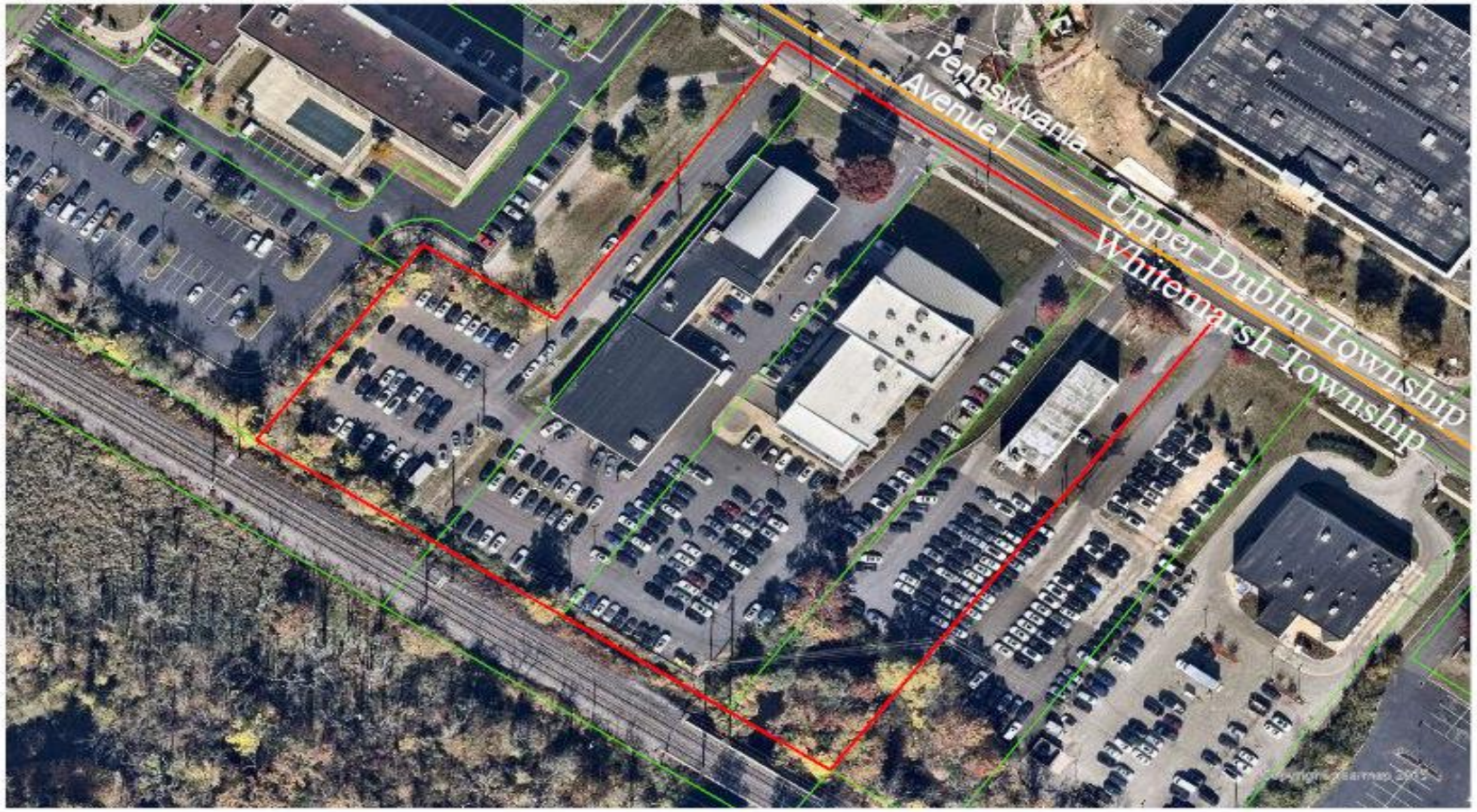
Barry W Jeffries, ASLA, Senior Design Planner
bjeffrie@montgomerycountypa.gov
(610) 278-3444

c: Aaron Kostyk, Chair, Township Planning Commission
Krista Heinrich, PE, Township Engineer
David Sander, Esq., Township Solicitor

Kurt Ferguson, Mgr., Upper Dublin Township
Fran Hanney, PennDOT District 6-0

Attachment A: Aerial Image of Site
Attachment B: Reduced Copy of Applicant's Proposed Site Plan

ATTACHMENTS A, B

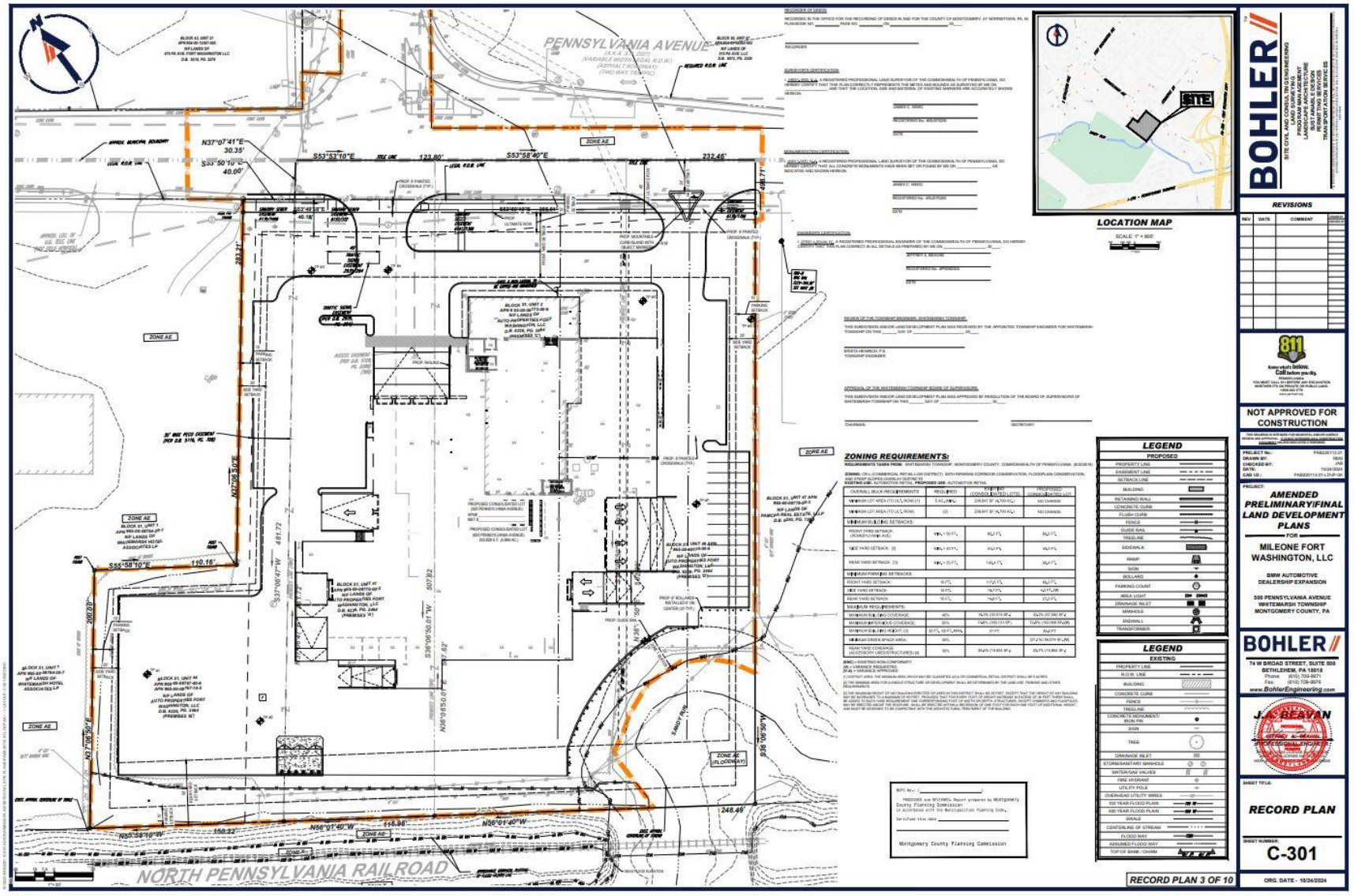


BMW Automotive Dealership Expansion
MCPC#230041002

Montgomery County Planning Commission
Montgomery County Courthouse - Planning Commission
PO Box 311 Norristown PA 19404-0311
(p) 610 278-3722 (f) 610 278-3941
www.montcopa.org/planning
Aerial photography provided by Nearmap

0 50 100 200 Feet

N


PENNSYLVANIA AVENUE
NORTH PENNSYLVANIA RAILROAD
LOCATION MAP
SITE
ZONING REQUIREMENTS:
LEGEND
PROPOSED
LEGEND
EXISTING
BOHLER
REVISIONS
NOT APPROVED FOR CONSTRUCTION
AMENDED PRELIMINARY/FINAL LAND DEVELOPMENT PLANS
MILEONE FORT WASHINGTON, LLC
BMW AUTOMOTIVE DEALERSHIP EXPANSION
500 PENNSYLVANIA AVENUE
WHITEMARSH TOWNSHIP
MONTGOMERY COUNTY, PA
74 W BROAD STREET, SUITE 500
BETHLEHEM, PA 18018
Phone (610) 709-9071
Fax (610) 709-9076
www.BohlerEngineering.com
J. A. BEAVAN
RECORD PLAN
C-301
RECORD PLAN 3 OF 10